

Teresa M. Corbin (SBN 132360)  
Denise M. De Mory (SBN 168076)  
Jaclyn C. Fink (SBN 217913)  
HOWREY LLP  
525 Market Street, Suite 3600  
San Francisco, California 94105  
Telephone: (415) 848-4900  
Facsimile: (415) 848-4999

Attorneys for Plaintiff SYNOPSYS, INC.  
and for Defendants AEROFLEX INCORPORATED,  
AMI SEMICONDUCTOR, INC., MATROX  
ELECTRONIC SYSTEMS, LTD., MATROX  
GRAPHICS, INC., MATROX INTERNATIONAL  
CORP., MATROX TECH, INC. and AEROFLEX  
COLORADO SPRINGS, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,  
Plaintiff

Case No. C03-04669 MJJ (EMC)

vs.

AEROFLEX INCORPORATED, et al.,  
Defendants

**ADMINISTRATIVE MOTION FOR  
PLACING DOCUMENTS UNDER SEAL  
(L.R. 7-11 and 79-5(d))**

Judge: Hon. Martin J. Jenkins

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## SYNOPSYS, INC.,

Plaintiff,

VS.

RICOH COMPANY, LTD.,  
Defendant.

1 Pursuant to Civil L.R. 7-11, Plaintiff Synopsys, Inc. and Defendants Aeroflex Incorporated,  
2 Aeroflex Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronic Systems, Ltd., Matrox  
3 Graphics, Inc., Matrox International Corp., and Matrox Tech, Inc. (“the Customer Defendants”) hereby  
4 bring this administrative motion for an order to file under seal, and request permission to file under  
5 seal the following Exhibits lodged with the Clerk of the Court:

6 1) Reply Memorandum in Support of Synopsys, Inc.’s and Customer Defendants’ Motion  
7 for Summary Judgment of Non-Infringement (RTL) (No. 1).

8 2) Reply Memorandum in Support of Synopsys, Inc’s and Customer Defendants’ Motion  
9 for Summary Judgment of Non-Infringement (Hardware Cells) (No. 2).

10 3) Reply Memorandum in Support of Synopsys, Inc.’s and Customer Defendants’ Motion  
11 for Summary Judgment of Non-Infringement (Other Elements) (No. 6).

12 4) Reply Memorandum In Support of Defendants' Motion for Summary Judgment  
13 Regarding the Scope of Patent Damages for Alleged Infringement of U.S. Patent No. 4,922,432 (No.  
14 7).

15 2) Exhibit Nos. 93-95 and 106 to the Supplemental Declaration of Denise M. De Mory In  
16 Support of Motions For Summary Judgment.

17 This request is made pursuant to the Stipulated Protective Order in this action. The above  
18 documents include and refer to materials produced in discovery and designated confidential by  
19 Synopsys and the Customer Defendants because they contain confidential business information of  
20 Synopsys, the Customer Defendants, and third parties. Public dissemination of this information could  
21 cause Synopsys, the Customer Defendants, or third parties competitive harm.

22 Exhibits 93-95 are allegedly confidential as designated by Ricoh Company, Ltd. (“Ricoh”).  
23 Pursuant to Civil L.R. 79-5(d), Ricoh is to file, within five court days, (i) a declaration establishing that  
24 the above information is sealable and (ii) a narrowly tailored proposed sealing order for those exhibits.

25 The Customer Defendant respectfully requests this Court to grant an order permitting the above  
26 documents to be filed under seal.

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1 Dated: September 11, 2006

Respectfully submitted,

4 By: /s/Denise M. De Mory  
5 Denise M. De Mory  
6 Attorneys for Plaintiff SYNOPSYS and  
7 Defendants AEROFLEX INCORPORATED,AMI  
8 SEMICONDUCTOR, INC., MATROX  
9 ELECTRONIC SYSTEMS, LTD., MATROX  
10 GRAPHICS, INC., MATROX INTERNATIONAL  
11 CORP., MATROX TECH, INC. and AEROFLEX  
12 COLORADO SPRINGS, INC.

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Telephone: (415) 848-4900  
Facsimile: (415) 848-4999

Attorneys for Plaintiff SYNOPSYS, INC.  
and for Defendants AEROFLEX INCORPORATED,  
AMI SEMICONDUCTOR, INC., MATROX  
ELECTRONIC SYSTEMS, LTD., MATROX  
GRAPHICS, INC., MATROX INTERNATIONAL  
CORP., MATROX TECH, INC. and AEROFLEX  
COLORADO SPRINGS, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

14	RICOH COMPANY, LTD.,	Case No. C03-04669 MJJ (EMC)
15	Plaintiff,	Case No. C03-2289 MJJ (EMC)

17 AEROFLEX INCORPORATED, et al.,  
18 Defendants.  
**ADMINISTRATIVE MOTION FOR  
PLACING DOCUMENTS UNDER SEAL  
(Civil L.R. 7-11 and 79-5(d))**

Judge: Hon. Martin J. Jenkins

20 | SYNOPSYS, INC.,

21 Plaintiff,

22 || VS.

23 | RICOH COMPANY, LTD.,

24 || Defendant.

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Case Nos. C03-4669 MJJ (EMC) and C03-2289 MJJ (EMC)  
[PROPOSED] ORDER GRANTING ADMINISTRATIVE  
MOTION FOR PLACING DOCUMENTS UNDER SEAL  
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1 Pursuant to Civil L.R. 7-11, plaintiff Synopsys, Inc. and defendants Aeroflex Incorporated,  
2 Aeroflex Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronic Systems, Ltd., Matrox  
3 Graphics, Inc., Matrox International Corp., and Matrox Tech, Inc. ("the Customer Defendants") on  
4 September 8, 2006 have filed an Administrative Motion for a Sealing Order pursuant to Civil Local  
5 Rules 7-1 and 79-5(d), and request to file under seal, the following documents:

6 1) Defendants' Reply Memorandum In Support of Defendants' Motion for Summary  
7 Judgment Regarding the Scope of Patent Damages for Alleged Infringement of U.S. Patent No.  
8 4,922,432.

9 2) Exhibit No. 106 to the Supplemental Declaration of Denise M. De Mory In Support of  
10 Motions For Summary Judgment.

11 Because the above documents include and refer to materials produced in discovery and  
12 designated confidential by the Customer Defendants or Synopsys this request was made pursuant to the  
13 Stipulated Protective Order in this action.

14 The Court hereby GRANTS this request.

15 IT IS SO ORDERED

16 Dated: \_\_\_\_\_

17 Hon. Martin J. Jenkins  
18 Judge of the United States District Court  
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